

VIA ECF

April 30, 2021

Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

RE: ***Solid 21, Inc. v. Richemont North America, Inc. et al.***, No. 1:19-cv-01262-LGS
Parties' Joint Status Letter

Dear Judge Schofield,

Pursuant to the Third Amended Civil Case Management Plan and Scheduling Order (Dkt. No. 114) and Your Honor's Individual Rule IV.A.2, the parties submit this joint status letter.

(a) Discovery That Has Taken Place

The following discovery has taken place. The parties exchanged initial disclosures on August 17, 2020. Both parties propounded requests for production ("RFP") on August 28, 2020 and the responses were originally due on October 28, 2020. On October 6, 2020, counsel for Plaintiff notified counsel for Defendants that they were withdrawing. This case was effectively stayed from that moment until new counsel appeared in the case in December and the Court lifted the stay by Order dated December 15, 2020. The parties then submitted a stipulated extension of the original schedule, and the Court entered a schedule on January 7, 2021.

Since that time, counsel have re-served their discovery requests. Plaintiff served its answers and objections to Defendants' requests for production and interrogatories on March 3, 2021 (with a revision to the latter on March 4, 2021). Defendants served their answers and objections to Plaintiff's requests for production on February 18, 2021. The parties served additional discovery requests on April 14, 2021: Plaintiff served its interrogatories and requests for admission, while Defendants served their requests for admission.

Thus far, Plaintiff produced 15,545 documents on February 23, 2021. Defendants produced 58 documents on March 26, 2021 and 68 documents on April 16, 2021.

(b) Procedural History of the Case

The following significant pleadings have been filed to date. Plaintiff filed the operative Third Amended Complaint ("TAC") on September 27, 2019. (Dkt. No. 67) Defendants moved to dismiss the TAC on October 18, 2019. (Dkt. No. 68) The Court granted in part and denied in part Defendants' Motion to Dismiss on June 8, 2020. (Dkt. No. 91) Defendants filed their Answer and Counterclaims to the TAC on July 13, 2020. (Dkt. No. 98) Plaintiff filed its Answer to Counterclaims on August 3, 2020. (Dkt. No. 102). No motions are pending at this time.

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(c) Parties' Plans to Ensure Compliance With Court Ordered Discovery Deadlines

The parties have produced a significant volume of documents to date and are in the process of reviewing them. The parties have scheduled fact depositions on May 7, 10, and 11. The parties have also conferred and exchanged proposals for a schedule to exchange expert reports within the current expert discovery deadline of June 29, 2021.

Sincerely,

/s/ David L. Hecht
David L. Hecht
Counsel for Plaintiff

/s/ John P. Margiotta
John P. Margiotta
Counsel for Defendants

cc: Counsel of Record